



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

MAY 8 2002

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number 7001 0320 0002 5013 4790

Mr. Michael L. House  
Manager, Remedial Projects  
Solutia Inc.  
P. O. Box 66760  
St. Louis, MO 63166-6760

Dear Mr. House:

RE: Notice of Violation  
Former Bulk Chemical Storage Area  
Solutia - J.F. Queeny Facility  
St. Louis, Missouri  
EPA ID No. MOD 004 954 111

The U.S. Environmental Protection Agency (EPA) Region 7, in coordination with the Missouri Department of Natural Resources (MDNR) has received and reviewed Solutia, Inc.'s (Solutia) the "Expedited Risk Evaluation, Former Bulk Chemical Storage Area, Solutia - Queeny Facility St. Louis, Missouri," prepared by URS and dated April 10, 2002. This document was reviewed for adherence to the EPA's "Risk Assessment Guidance for Superfund," (RAGS) (EPA 1989a), and for consistency with best professional practices.

As you are aware, the expedited risk evaluations have been submitted in order to resolve an outstanding Notice of Violation (NOV) issued by EPA to Solutia on September 3, 1997 for violation of its Hazardous and Solid Waste Amendments (HSWA) permit. Specifically, EPA alleges that Solutia violated its HSWA permit by selling and/or leasing portions of its property without prior notification to EPA or the MDNR. The portions of the property which were sold and/or leased included the Former Bulk Chemical Storage Area, which is listed as a Solid Waste Management Unit (SWMU) and under investigation according to the terms and conditions of the HSWA permit.

The purpose of this letter is to notify Solutia that the issue identified in the Notice of Violation has been addressed by the collection of additional data at the Former Bulk Chemical Storage Area and the preparation of the Expedited Risk Assessment. EPA agrees with the risk



R00191276

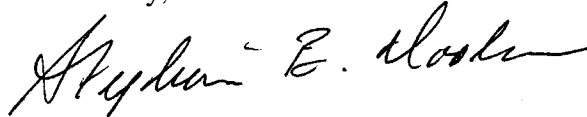
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assessment's conclusion that risks and hazards in this area are currently within acceptable limits for industrial use; however, under some hypothetical future use scenarios, risks or hazards may be unacceptable. The Former Bulk Chemical Storage Area is not released for unrestricted industrial use, and needs further evaluation in the Corrective Measures Study.

If you have any questions regarding this correspondence, please do not hesitate to contact me at (913) 551-7719.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie B. Doolan". The signature is fluid and cursive, with the first name being the most prominent.

Stephanie B. Doolan  
Project Manager  
RCRA Corrective Action and Permits Branch

cc: Vin Journey, MDNR

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The purpose of this letter is to notify Solutia that the issue identified in the Notice of Violation has been addressed by the collection of additional data at the Former Bulk Chemical Storage Area and the preparation of the Expedited Risk Assessment. EPA agrees with the risk assessment's conclusion that risks and hazards in this area are currently within acceptable limits for industrial use; however, under some hypothetical future use scenarios, risks or hazards may

be unacceptable. The Former Bulk Chemical Storage Area is not released for unrestricted industrial use, and needs further evaluation in the Corrective Measures Study.

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Sincerely,

Stephanie B. Doolan  
Project Manager  
RCRA Corrective Action and Permits Branch

cc: Vin Journey, MDNR

ARTD/RCAP:SDOOLAN:CS:5/8/02:H:/RCAP Branch/Lowe Unit/Doolan/Solutia/NOV  
Resolution Bulk Chemical.wpd

RCAP	RCAP	CNSL
DOOLAN	LOWE	BUNCH

*SDoolan*  
*5/8/02*

*WFL*  
*5/8/02*

*HJB*  
*5/8/02*

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1. Article Addressed to:

Mr. Michael L. House  
Mgr. Remedial Projects  
Solutia  
PO Box 66760  
St. Louis, MO 63166-6760

2. Article Number

(Transfer from service label)

7001 0320 0002 5013 4790

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RCAP

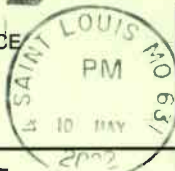
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US Environmental Protection Agency  
RCRA/ARTD/RCAP  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101

*Dolan Solicita Nov Re. ulke ch*

